

I. Introduction

My name is John Brissenden. I am co-owner, with wife Patty, of Sorensen's Resort, 20 miles south of Lake Tahoe in Hope Valley, CA. I am a local businessman of 22 years, and Innkeeper living in the Sierra Nevada. I am a former member of the Alpine County Board of Supervisors and current Board Member, of the California Regional Water Quality Control Board, Lahontan Region. This month re-appointed by Governor Schwarzenegger. I am also a member of the California State Park Off-Highway-Vehicle Commission. Father of four, grandfather of three, who loves the woods and lives in a log home.

II. Securing the Sierra Nevada's Future

Millions of visitors enjoy the natural beauty of the Sierra Nevada every year, but few know that its forests, streams and wildlife are at immediate risk. The recent January 2004 decision by the Forest Service will compromise these irreplaceable resources for future generations of hikers, campers and anglers.

The federal government's plan will greatly increase logging and reduce protections for old growth forests, water and wildlife throughout the Sierra Nevada. It would substantially weaken the Sierra Nevada Framework, a landmark plan over ten years in the making by the Forest Service, scientists, community activists, business owners, and conservationists.

The Sierra Nevada Framework directs the management of 11.5 million acres of national forest lands in California, from the Sequoia National Forest in the southern Sierra to the Modoc National Forest in northeastern California. It takes a balanced approach to forest management and economic interests. The existing Framework directs money and resources where it matters most - toward reducing wildfire risk to homes and towns adjacent to Sierra Nevada national forests. The plan calls for the removal of small diameter trees and dense underbrush (the vegetation most vulnerable to fire) through thinning and prescribed burning.

The Framework revisions allow the timber industry to triple the amount of logging in some forests, and cut large fire-resistant trees in remote areas. The Forest Service has a big job, but limited resources. As a key matter of prioritization, those resources should not be squandered on areas where there is no threat to human life.

According to the Sierra Nevada Ecosystem Project - the product of a cooperative research agreement between the Forest Service and University of California - logging accounts for less than three percent of the economy of the Sierra region, while tourism and recreation are the main economic engines. During the last twenty years, the major commodity-based sectors of timber, mining and agriculture, experienced little or no

growth in employment. On a range-wide basis, recreation and tourism provide more jobs and roughly the same total amount of wages as all the commodity-based sectors combined.

It is well documented that the economy of the Sierra Nevada is a diverse economy (CDF, Sierra Business Council, Alexander & Rasker-Bureau of Labor Statistics). Recreation, tourism, professional services, government, small businesses, and wood products all contribute to this diversity. Remarkably, the Final SEIS dedicates only 1.5 pages out of over 400 discussing the overall economy of the entire Sierra Nevada! And, that singularly discusses job changes in the timber industry, as if the economic future of the Sierra Nevada is to be found in what is a very small sector of the overall economy. As the owner of a non-timber business in the Sierra Nevada, I am offended by this simplistic and artificial representation of economic conditions of where I have lived and worked for over 20 years. Unfortunately, when it comes to the economy of the Sierra Nevada, the Forest Service clearly cannot see the forest for the trees. In terms of long-term economic prosperity, protecting the Sierra Nevada Framework and preserving old growth and large trees is better than the federal government's plan to reopen the door to widespread logging of large, fire-resistant old trees.

Governor Schwarzenegger has pledged to uphold the existing Sierra Nevada Framework, saying "More than a decade of hard work by a broad variety of stakeholders resulted in the Sierra Nevada Framework, which has been widely hailed as a model of forest ecosystem resource protection." Speaking to The Los Angeles Times (9/07/03), he said he would "call on the federal government to honor its pledge to abide by the policies set forth in this unprecedented compact."

The 2001 Framework also has overwhelming scientific and public support, with over 30,000 letters and postcards generated by citizens that want the plan to be upheld and implemented. If the federal government pursues an isolated course of action to revise it, years of collaborative research and experience as well as the public interest will be disregarded.

III. Brief comments on the Forest Service 2004 revisions and their "Forests with a Future" presentation.

First, the Forest Service has never made an honest attempt to implement the 2001 Framework Plan. The Framework Plan identified 320,000 acres in the "defense zone"* (the area nearest communities), where there was maximum treatment flexibility and minimum restrictions on timber harvest. There is less restriction than in the previous 10 years under the old CASPO Interim Guidelines. This area was identified as critical to protect human life and property. 320,000 acres available for treatment is equal to at least 5 years of import work where it is needed most. The Forest Service accomplished very little work over the last three years, largely sitting on their hands to demonstrate the 2001 Framework couldn't work. Regional Forester Blackwell can't explain why this is the case, yet he is responsible for this lack of motivation.

*the defense zone is the area $\frac{1}{4}$ out from the land use designation of 1 dwelling unit/5 acres. (snag retention, down log retention, and basal area retention standards were eliminated in this zone)

Second, it's the surface fuels! While the Forest Service is busy preparing to log large, fire resistant trees in the name of fire risk reduction, all of the available fire science is clear that to control wildfire behavior, treating the surface and ladder fuels is critical and should be the primary objective. Logging large over-story trees as proposed in the 2004 Framework Revisions stands the best scientific information on its head and has the potential to increase fire severity by leaving logging slash in the forest, lowering humidity and drying the forest floor, increasing wind speed and rate of fire spread, and allowing more sunlight to reach the forest floor which increases shrub growth (August 2000 Congressional Research Service).

The 2001 Framework is an active management plan that is focused on the real problem (reducing surface and ladder fuel build-up) but also allows the cutting of trees up to 20" diameter on 11 million acres where necessary to meet fuel reduction objectives.

Third, old growth forest will be logged under the revisions. Regional Forester Blackwell's attempt to minimize the treatments is misleading and tries to mask the real environmental degradation associated with the logging of large trees. By the best estimates, [SNEP1996, Beardsley 1999, 2001 Framework FEIS Vol. 2] Sierra Nevada old growth forests have been reduced to less than 15% of the original pre-settlement condition.

While the "Forests of the Future" public relations presentation suggests under the 2004 revisions only a tiny fraction of the Sierra's forests will be logged, and a tiny fraction of those trees will be large, in reality this is nothing but Forest Service bait and switch.

While Forest Service computer modeling shows that few trees larger than 25 inches will be cut, the final record of decision (standards) says they can cut trees up to 30 inches, and that is what they will do, "computer modeling" aside. Adding up all the trees in the 430-mile mountain range in a statistic, to suggest the Forest Service will only cut a "few" trees is misleading to the public and hides the fact that there will be **real harm** to old growth forests and wildlife where this logging occurs. Certainly the tripling of logging volume won't come from 2"-4" trees as their press information suggests.

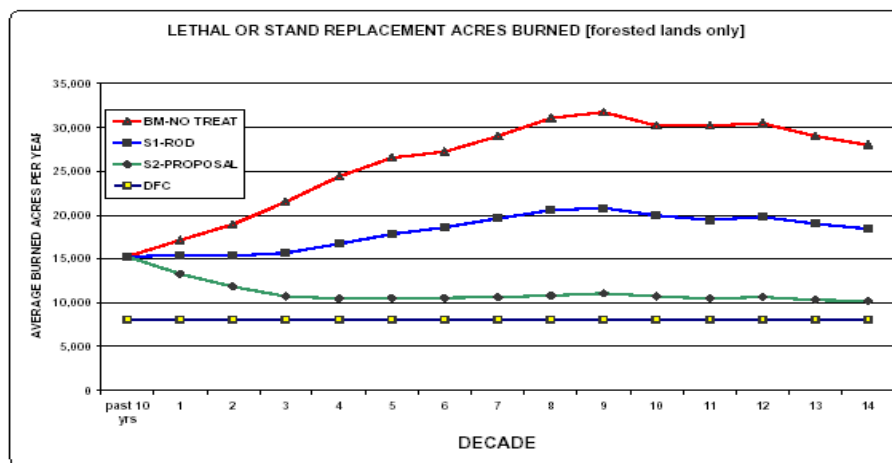
Fourth, the newly revised, so-called "Future Forests", threatens the quality and digs deep into the forests, which provide our water, a huge concern of the people of California. The Regional Water Quality Boards have been mandated to review and approve logging projects, and a threefold increase in yield should alarm all Californians as to maintaining and protecting our water resources and quality. The SNEP Report, June 1996, Volume I, Chapter 2, page 30 Fig., reports that the total value of water annually, based on water rights, is worth 1.35 BILLION dollars. Total value of Public Timber, based on California State Board of Equalization, is worth 150 MILLION dollars. Clearly, water is substantially more important to Californians than timber, as these numbers show. Even

without the dollar values, almost all Californians would agree that water is more important than timber!

Fifth, the Forest Service misstates the amount and effect of recent fires in the Sierra Nevada. In the 2003 draft supplemental EIS the Forest Service characterizes Sierra Nevada fire as 68,000 acres/year of old forest “lost” annually. The DSEIS states, “at this rate we will burn up old forest faster than it can be replaced.” (DSEIS Summary p.3)

It is misleading to characterize the total amount of acres burned as “lost” (suggesting that all fire is lethal fire). On DSEIS p.163 Figure 4.2.4b (see below) lethal or stand replacing fire is displayed as approximately 15 thousand acres/year to the third decade. My point is, we all agree that stand-replacing fire is a bad thing, but much of the fire that burns in the Sierra Nevada is environmentally beneficial. Remember that the Sierra Nevada is a fire dependent ecosystem that evolved with periodic fire. The Forest Service must stop putting their spin of fire impacts and come clean with the people of California citing real numbers (for severity and types of acres burned) and develop scientifically accurate explanations of the value of regular low-intensity fire in the Sierra Nevada.

Figure 4.2.4b. Projected wildfire acres per year under each alternative for lethal or “stand replacement events.”



In addition, it is important that great caution be exercised in comparing what happened in Southern California during the fires of 2003 and then drawing conclusions about fire in the Sierra Nevada. The reality is that the Sierra is not San Bernardino or San Diego. Using the Southern California fires to spread fear throughout the Sierra is unjustified. It also flies in the face of some sobering realities about the differences between the two regions.

For example, not only has California experienced 4-5 years of sustained drought, even during “normal” years, rainfall is 5-6 times greater across most of the Sierra. Secondly, the fires of Southern California were driven by 50-60 mile per hour Santa Ana winds, which don’t exist in the Sierra Nevada. Next, to the extent that logging is promoted as an

antidote to wildfire, here in the Sierra we have a hundred years of active logging – quite different from the management history of the San Bernardino or Cleveland National Forests. Finally, the vast majority of the land that burned in Southern California wasn't even forestland. In fact, according to the California Department of Forestry, only 10 percent of the land that burned was conifer forest.

Nonetheless, I think we would all agree that the threat of wildfire to Sierra communities is serious and that something must be done to reduce those threats. The Forest Service, though, has taken a hazardous fuel reduction plan and transformed it into a logging plan. In so doing, the agency has compromised the other key goal of the original Sierra Framework – the maintenance and enhancement of old growth forests through active management practices tailored to old growth forests.

While it appears to have been forgotten by the Forest Service, the central purpose of the original Sierra Framework was to reduce the risk of severe wildfire in the Sierra. It was, in fact, a management-based plan that utilized all of the tools necessary to reduce and moderate fire behavior – including forest thinning, prescribed burning, mechanical treatments, and wildland fire use. Its central purpose was to reduce the risk of catastrophic fire through a program of active management designed to slow down the rate of spread of wildfire, increase the distance between the ground and tree crowns (height to live crown), and shorten flame lengths. It was also an honest plan, in that it focused on removing the right fuels – the surface and ladder fuels you have all heard about today. It is indeed these fuels that must be treated to reduce fire severity, namely brush, dead and down woody material, and the small and mid-diameter trees (12-30 inches in diameter), depending on land allocation, that the Framework treated.

Lastly, the 2004 revisions were not conducted with a fair and open process. The 2001 Sierra Nevada Framework that had over 120 public meeting with a monumental amount of free and open dialogue between scientists, Forest Service specialists, a broad spectrum of interested organizations and the general public. The 2004 revisions were created by 6 people locked in a room with very limited discussions on 6 occasions with some handpicked special interests. It's no wonder that the internal review from the Washington Office of the Forest Service and the Region's own Science Consistency check found numerous and significant flaws in Regional Forester Blackwell's 2004 revisions to the Framework Plan.

In Conclusion: It is the right and responsibility of Californians to protect our national forests - after all, they belong to us. Our forests provide 60% of the state's clean drinking water. They contribute to our quality of life and the economy by providing recreational opportunities for millions of Californians and its visitors

The "Range of Light" is part of California's heritage and should be preserved as a legacy to our children. If the Forest Service is allowed to obliterate the existing Sierra Nevada Framework, the damage will be felt for generations to come.